

EXHIBIT C

In The Matter Of:

Desheila Howlett v. City of Warren

Officer Anwar Khan

May 4, 2018



Officer Anwar Khan
May 4, 2018

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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION	TABLE OF CONTENTS
DESHEILA C. HOWLETT, Plaintiff,	WITNESS PAGE
vs. Case No. 17-11260	OFFICER ANWAR KHAN
Hon. Terence G. Berg	
Mag. Judge Steven Whalen	EXAMINATION BY MR. MUNGO: 4
CITY OF WARREN; COMMISSIONER JERE GREEN, acting in his individual capacity; LT.	EXAMINATION BY MR. ACHO: 116
LAWRENCE GARDNER; SHAWN JOHNSON; DAWN MCLANE; ANWAR KHAN; DARRIN LABIN;	RE-EXAMINATION BY MR. MUNGO: 123
WILLIAM ROSS; KEVIN BARNHILL; PAUL HOUTOS; SCOTT TAYLOR,	RE-EXAMINATION BY MR. ACHO: 135
Defendants.	
	EXHIBITS
The Deposition of OFFICER ANWAR KHAN	EXHIBIT PAGE
Taken at 1 City Square	(Exhibits attached to transcript.)
Warren, Michigan	DEPOSITION EXHIBIT 1 17
Commencing at 10:05 a.m.	General Order 1/10/2013
Friday, May 4, 2018	DEPOSITION EXHIBIT 2 35
Before Joanne Marie Bugg, CSR-2592, RPR, RMR, CRR	General Order 7/24/2017
	DEPOSITION EXHIBIT 3 61
	Phase I Assessment for Officer Howlett
	DEPOSITION EXHIBIT 4 68
	Phase II Recommendation - PO Howlett
	DEPOSITION EXHIBIT 5 63
	Phase III Assessment for Officer D. Howlett #155
	DEPOSITION EXHIBIT 6 73
	PO Desheila Howlett #165 Phase #3 Assessment
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1 APPEARANCES:	1 Warren, Michigan
2	2 Friday, May 4, 2018
3 LEONARD MUNGO	3 10:05 a.m.
4 The Mungo Law Firm, P.L.C.	4
5 333 West Fort Street, Suite 1500	5 OFFICER ANWAR KHAN,
6 Detroit, Michigan 48226	6 was thereupon called as a witness herein, and after
7 313.963.0407	7 having first been duly sworn to testify to the truth,
8 mungol16@msn.com	8 the whole truth and nothing but the truth, was examined
9 Appearing on behalf of the Plaintiff.	9 and testified as follows:
10 JAMES R. ACHO	10 EXAMINATION
11 ELIZABETH RAE-O'DONNELL	11 BY MR. MUNGO:
12 Cummings, McClorey, Davis & Acho, P.C.	12 Q. Sir, could you state your full correct name, legal
13 17436 College Parkway	13 name, for the record. And that's what I meant, your
14 Livonia, Michigan 48152	14 full legal name.
15 734.261.2400	15 A. First name is Anwar, A-N-W-A-R.
16 jacho@cmda-law.com	16 Q. I'm so sorry.
17 erae@cmda-law.com	17 A. Go ahead.
18 Appearing on behalf of the Defendants.	18 Q. And then spell it for us, please, so that we have it
19 ETHAN VINSON	19 correct. Thank you.
20 City of Warren, City Attorney's Office	20 A. All right. First name is Anwar, A-N-W-A-R. Last name is
21 1 City Square, Suite 400	21 K-H-A-N, Khan.
22 Warren, Michigan 48093	22 Q. No middle initial?
23 586.574.4671	23 A. M.
24 evinson@cityofwarren.org	24 Q. What does that stand for, sir?
25 Appearing on behalf of the Defendants.	25 A. It's Mohammed, M-O-H-O-M-M-E-D.

Officer Anwar Khan
May 4, 2018

<p style="text-align: right;">Page 121</p> <p>1 We got to go find him." So one guy leaves. Ten</p> <p>2 minutes later another guy leaves. A few minutes later,</p> <p>3 another one leaves. Well, they're like, "Can you watch</p> <p>4 the car? We'll be back in a minute." She goes inside.</p> <p>5 Another officer pulls up and sees Desheila.</p> <p>6 And he runs the plate of the car that she's standing</p> <p>7 next to, and it comes back a stolen vehicle. So at that</p> <p>8 point he's like, "Desheila, an unoccupied stolen car?"</p> <p>9 She said, "No, there was five guys here. It's stolen?"</p> <p>10 "Yeah, it's a stolen car." She's like, "Oh, the guys</p> <p>11 are inside. They said they had to go get their --"</p> <p>12 Like, okay. So they started calling units over.</p> <p>13 And from that point, this is Desheila's now.</p> <p>14 This is her baby. This is hers. She's the one who</p> <p>15 initiated. She's the one. She's going to deal with it.</p> <p>16 But everyone's flying from every part of the city</p> <p>17 lights and sirens to help her. They get all the way</p> <p>18 over, and they find one of the guys here, one on the</p> <p>19 freeway running across. They're screaming on the air,</p> <p>20 hey, there's one across 696. One's going this way.</p> <p>21 Well, Desheila finally gets on the road, and</p> <p>22 another officer is coming up behind her. And next</p> <p>23 thing you know, dispatch goes over the air and says,</p> <p>24 can anyone break for a possible injury accident in</p> <p>25 Madison Heights? Desheila locks up her brakes, the</p>	<p style="text-align: right;">Page 123</p> <p>1 credible, should it?</p> <p>2 A. No, sir.</p> <p>3 MR. ACHO: I have nothing further.</p> <p>4 RE-EXAMINATION</p> <p>5 BY MR. MUNGO:</p> <p>6 Q. Okay. You had gotten in a fight with Gil, correct?</p> <p>7 A. A fistfight, sir?</p> <p>8 Q. Any kind of fight.</p> <p>9 A. Argument?</p> <p>10 Q. Any kind of fight, physical or otherwise? You've been</p> <p>11 in fights with him, or at least one fight with Gil,</p> <p>12 correct?</p> <p>13 A. I've never had a fight with Art Gil, never.</p> <p>14 Q. Physical or verbal?</p> <p>15 A. Nope.</p> <p>16 Q. Okay. Did he ever threaten you?</p> <p>17 A. Oh, yeah.</p> <p>18 Q. Had you ever threatened him?</p> <p>19 A. No. He's a supervisor.</p> <p>20 Q. Okay. So you never threatened him?</p> <p>21 A. No way.</p> <p>22 Q. All of these so-called performance issues that you're</p> <p>23 testifying to that Ms. Howlett had were all during the</p> <p>24 time in which you worked with her, is that correct?</p> <p>25 A. I'm sorry?</p>
<p style="text-align: right;">Page 122</p> <p>1 officer behind her clips her, goes around. She flips</p> <p>2 the car around, and starts heading the other direction</p> <p>3 to go to check on this accident, which isn't even ours.</p> <p>4 It's Madison Heights. I mean, this is yours. This is</p> <p>5 your -- you know, you initiated this. They got away</p> <p>6 from you. Now guys are coming to help you, and your</p> <p>7 mindset is just to just ignore it, and go handle</p> <p>8 something, and an officer hits you?</p> <p>9 Q. It was a bad day for her?</p> <p>10 A. Every day was like that.</p> <p>11 Q. Okay. Finally, are you familiar with a gentleman named</p> <p>12 Art Gil?</p> <p>13 A. Yes, I am.</p> <p>14 Q. Okay. Art Gil is currently under criminal indictment,</p> <p>15 is he not?</p> <p>16 A. Yes, he is.</p> <p>17 Q. And that is for making false accusations and reports</p> <p>18 about you, correct?</p> <p>19 A. Myself and my family, correct.</p> <p>20 Q. Okay. Art Gil has been found to be a perjurer in the</p> <p>21 past; is that right?</p> <p>22 A. Yes, it is.</p> <p>23 Q. He's looking at jail time?</p> <p>24 A. Correct.</p> <p>25 Q. Nothing he says to anyone should be considered</p>	<p style="text-align: right;">Page 124</p> <p>1 Q. You just answered a series of questions from opposing</p> <p>2 counsel regarding the kind --</p> <p>3 MR. ACHO: Can you lower your voice?</p> <p>4 A. I can hear you fine.</p> <p>5 BY MR. MUNGO:</p> <p>6 Q. Well, sir, when you put your hand behind your ear, and</p> <p>7 lean forward, and point your ear towards me, I'm going</p> <p>8 to speak a little louder, okay?</p> <p>9 A. Go ahead.</p> <p>10 Q. All right. So if you're not having problems, I won't do</p> <p>11 that, okay?</p> <p>12 A. Good.</p> <p>13 Q. I'm trying to accommodate you. Okay. So counsel just</p> <p>14 asked you a series of questions regarding Ms. Howlett,</p> <p>15 and you're saying how her performance was subpar?</p> <p>16 A. Horrendous.</p> <p>17 MR. ACHO: Let him finish.</p> <p>18 BY MR. MUNGO:</p> <p>19 Q. Let me finish my question.</p> <p>20 A. I'm sorry. I'm sorry.</p> <p>21 Q. You answered counsel's questions.</p> <p>22 A. Yes.</p> <p>23 Q. Indicating that Ms. Howlett's performance as a police</p> <p>24 officer was subpar?</p> <p>25 A. Yes.</p>